

US EPA RECORDS CENTER REGION 5



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Monthly Oversight Report 4  
ACS NPL Site  
Griffith, IN  
March 30, 2001 - May 4, 2001



# BLACK & VEATCH

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Black & Veatch Special Projects Corp.

USEPA/RAC VII  
American Chemical Services RAO (057-ROBF-05J7L1)

BVSPC Project 46526  
BVSPC File C.3  
May 16, 2001

Mr. Kevin Adler  
U.S. Environmental Protection Agency  
77 W. Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

✓  
KA.  
5/22/2001

Subject: Monthly Oversight Summary Report  
No. 4 for April 2001

Dear Mr. Adler:

Enclosed is the Monthly Oversight Summary Report No. 4 for April 2001 for the American Chemical Services Superfund Site in Griffith, Indiana.

If you have any questions, please call (312-683-7856) or email ([campbelllm@bv.com](mailto:campbelllm@bv.com)).

Sincerely,

BLACK & VEATCH Special Projects Corp.

Larry M. Campbell, P.E.  
Site Manager

Enclosure

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**Monthly Oversight Summary Report No. 4**  
**ACS Superfund Site WA30, 46526.238**

**Reporting Period:** Month of April (March 31 - May 4, 2001)

**BVSPC O/S Dates:** April 3, 6, 12, 13, 17, 19, 23, 25, 26, and May 3, 2001

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson, Warrenville, IL	10	Respondent's General Contractor
Black & Veatch Special Projects Corp. (BVSPC)	3	USEPA Oversight Contractor
Mid American Drilling	2	Drilling Contractor
Dave's Tree Service	5	Clearing & Grubbing Contractor
Austgen Electrical	4	Electrical Contractor/Drum Pad Grounding System & Sump Pump Installation
Security Fence	2	Fencing Contractor/Installation of Entrance Gate
Top Flight Environmental Drilling	2	Geoprobe Contractor
Koester Environmental Services	7	Buried Drum Removal Contractor
Ryan Construction	4	Onsite Drum Staging Pad

**Construction Activities**

**Major Activities:**

- ORC piezometer well installation in the south area (Montgomery Watson with Mid American Drilling).
- Abandonment of ATMW-4D and the installation of replacement well MW-55 (Montgomery Watson with Mid American Drilling).
- Construction of the onsite drum staging pad for the drum removal action (Ryan Construction).
- Clearing and grubbing of the south offsite area (Dave's Tree Service).

- ORC injection in the south area (Montgomery Watson with Top Flight Environmental Drilling).
- Buried Drum Removal taking place in Area "A" (Montgomery Watson with Koester Environmental).

#### **Activities Performed:**

Mid American Drilling installed five piezometers in the south area as part of the ORC pilot study. Mid American Drilling also performed the abandonment of ATMW-4D and installation of its replacement, MW-55. The ORC injection began once baseline samples were collected from the ORC wells. The injection work started on April 11, 2001, and was halted on April 16, 2001, because the contractor was unable to produce documentation of their health and safety training and medical monitoring. Work resumed on April 18, 2001, upon presentation of the necessary documents. A modification to South Array 3 occurred due to the presence of a gas pipeline along the northern edge of the array. Due to the obstruction, ORC injection was not possible within 20' of the pipeline. To compensate for this loss, an additional area just north of the pipeline, between the property fence line (to the west) and the edge of Colfax Road (to the east), will receive ORC injection. This work is ongoing and is being performed by Top Flight Environmental Drilling.

Ryan Construction completed the work on the drum staging pad in the onsite area. Due to time constraints, a 7-day mix was used for the majority of the pad. Upon completion, it was discovered that a portion of the pad was not draining correctly, so that portion was removed and re-poured using a 3-day mix.

Dave's Tree service completed the clearing and grubbing in the south offsite area. The resulting chips and compost will be placed in the offsite area as part of the spoils pile management.

The week of April 23, 2001, was the kick-off for the buried drum removal activities. Koester Environmental had been chosen to perform this work, and mobilized to the site on Monday, April 23. A Health & Safety Orientation was held on Wednesday, April 25. Topics covered included: ACS emergency protocol, location of MSDS information, PPE requirements, exclusion zone rules, and the general removal/excavation safety procedures. A hospital route dry run followed the meeting. Austgen Electrical spent several days working on the installation of the sump pump and the grounding system for the drum staging pad. Once this work was complete, Koester began the excavation. Koester expects the work to take approximately 6 to 8 weeks, anticipating a recovery of 40 drums per day. Friday, April 27, the first day of excavating activities for the buried drum removal, 75 drum carcasses had been removed and 11 in-tact drums were overpacked.

Discussions regarding acceptable behaviors within the exclusion zone took place between Montgomery Watson and BVSPC personnel. These discussions covered the use of protective footwear within the boundaries of the exclusion zone during the periods when the zone is downgraded to Level D, and the importance of wearing the required PPE (respiratory protection) within the boundaries of the exclusion zone while taking perimeter air samples, even when keeping a large distance from the excavation and drum sampling. Montgomery Watson also has chosen a more secure location for the archived drum samples. These samples will be stored in the Filter Press Room of the GWTP, and will be monitored by Lee Orosz.

Attached are BVSPC's weekly reports, correspondences, log book notes, and photographs of the daily



activities. BVSPC's crew conducted oversight of the major field activities during April 3, 6, 12, 13, 17, 19, 23, 25, 26, and May 3, 2001.

**Topics Of Concern:**

- Infiltration of material in EW20 (noting the open clean out end is approximately 11 feet below ground surface).
- Alignment and placement of EW20A, B, and C extraction wells, appear in a serpentine alignment instead of the straight line detailed in the work plan (note - the west end alignment was moved south before installation).
- EW19 may have been compromised during installation activities when the trencher became lodged in the extraction trench and bentonite was added to stabilize the trench walls.
- Montgomery Watson was unable to obtain a groundwater elevation at monitoring well MW-18 because of debris in the well. MW-18 is part of the long term monitoring program.
- The integrity of the abandonment casing around ATMW-4D is suspect because during installation the outer casing was driven in with the kelly bar and auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.
- Exclusion zone reclassification process, and personnel procedures within the exclusion zone.

**Concern Resolution:**

- Extraction trenches/well integrity will be evaluated with a down hole camera (delayed until further notice).
- Alignment of the EW20 wells will be verified with the as built drawings supplied by Hansen Engineering (pending).
- Onsite Health & Safety concerns were addressed by Kevin Adler. The following items shall be instituted to ensure safety is upheld:
  1. Tail gate safety meetings will be held every morning by each subcontractor which will include reviewing a standard check off list.
  2. A site safety coordinator will be designated.
  3. A personnel chart shall be created, listing staff persons and the activities for which each is responsible.

**Upcoming Activities:**

- Koester Environmental will continue buried drum removal activities.
- Offsite spoil management/regrading is expected to begin mid-May.
- PCB removal tentatively scheduled to start late summer; date not yet finalized.

**Signatures:**     Margaret Mulkerrin

**Date:**     May 14, 2001

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**Weekly Oversight Summary Report No. 5**  
**ACS Superfund Site WA30, 46526.238**

**Reporting Period:** Week of April 2, 2001

**BVSPC O/S Dates:** April 3 (Ms. Mulkerrin), and April 6 (Mr. Gailey), 2001

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson, Warrenville, IL.	3	Respondent's General Contractor
Black & Veatch Special Projects Corp, (BVSPC)	2	USEPA Oversight Contractor
Mid American Drilling	2	Drilling contractor
Ryan Construction	4	Staging pad Contractor
Dave's Tree Services	5	Clearing and Grubbing offsite area

## **Construction Activities**

### **Major Activities:**

- ORC well installation in the south area (Montgomery Watson with Mid American Drilling).
- Abandonment of ATMW-4D and the installation of a replacement well (Montgomery Watson with Mid American Drilling).
- Construction of the onsite drum staging pad, for the drum removal action (Ryan Construction).
- Clearing and grubbing of the offsite area (Dave's tree service).
- No construction coordination meeting took place this week.

### **Activities Performed:**

Montgomery Watson's one man field crew over saw drilling activities performed by Mid American drilling. Drilling activities included installing 5 piezometers in the south area as part of the ORC study, the abandonment of ATMW-4D and the installation of its replacement MW-55. BVSPC observed the installation of the wells on the west side of Colfax in the south area on April 3, 2001 and the well abandonment/replacement on April 5, 2001.

Ryan Construction is currently on schedule per schedule Tom Tinics set out at the end of March for the construction of the staging pad. Although Tom Tinics did state that the cure date and been pushed up: the

concrete is a seven day mix instead of a fourteen day cure mix. BVSPC observed the third phase of the staging pad construction.

Dave's Tree Services is finished with the clearing of the offsite area and continues to chip and compost material. The resulting chips and compost piles will be placed in the offsite area as part of the spoils pile management.

#### Topics Of Concern:

- BVSPC has not received a copy of the approved ORC work plan.
- BVSPC observed Ryan construction excavating a conveyance trench for the sump of the staging pad in the onsite area. No air monitoring was observed during excavation of the conveyance trench. BVSPC asked Tom Tinics about the air monitoring of the excavation. Tom Tinics replied air monitoring was performed when Ryan initially broke ground. The trench is approximately a 120 feet of excavation down to top of the onsite water table.
- The infiltration of material in EW20 (noting the open clean out end is approximately 11 feet below ground surface).
- Alignment and placement of EW20A, B, and C extraction wells show a serpentine alignment. The print calls for a straight line (noting the west end alignment was moved south before installation).
- EW19 may have been compromised by installation activities, due to the fact the trencher became lodged in the extraction trench.
- Montgomery Watson was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness due to the fact that the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.

#### Concern Resolution:

- Extraction well integrity will be evaluated with a down hole camera (has been delayed until further notice).
- Alignment of the well will be verified with the as built drawings supplied by Hansen Engineering (pending).

#### Upcoming Activities:

- April 9: weather pending, offsite spoil pile consolidation and grading will begin.
- April 16: Koester Environmental will mobilize to the site for onsite drum removal.
- April 10: ORC initial sampling may take place.
- April 11: ORC injection may take place pending ORC sampling schedule.

Signature: Margaret E. Mulkerrin  
Chad Gailev

Date: April 3, 2001  
Date: April 6, 2001

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**Weekly Oversight Summary Report No. 6**  
**ACS Superfund Site WA30, 46526.238**

**Reporting Period:** Week of April 9, 2001

**BVSPC O/S Dates:** April 13 (Ms. Mulkerrin), and April 12 (Mr. Gailey), 2001

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson, Warrenville, IL	3	Respondent's General Contractor
Black & Veatch Special Projects Corp (BVSPC)	2	USEPA Oversight Contractor
Top Flight Environmental Drilling	2	Geoprobe contractor

## **Construction Activities**

### **Major Activities:**

- ORC injection in the south area (Montgomery Watson with Top Flight Drilling).
- Weekly construction coordination meeting.

### **Activities Performed:**

Montgomery Watson's one man field crew over saw ORC injection in the south area. ORC injection began on April 11, 2001. ORC injection started after a base line sampling was collected on April 10, 2001 from the five ORC wells (ORC-PZ101 through ORC-PZ105). Friday, April 13, 2001, ORC activities were hindered with the breaking of a hydraulic line on the Geoprobe. BVSPC observed the ORC injection in the south area located in the front yard of 1002 Reder Road on April 12 and 13, 2001.

Montgomery Watson construction coordination meeting took place on April 12, 2001. The meeting covered health & safety, scheduling, routes of communication, question of status and current activities, and the availability of a new construction trailer.

### **Health & safety:**

The topic was the recent event of excavation in the onsite area by Montgomery Watson without properly following HAZWOPER protocol. Montgomery Watson admitted that safety was lacking and would be improved with the return of morning tail gate safety meeting, a named health & safety officer responsible for monitoring construction activities, and the use of a flow chart updated regularly with activities being performed and personnel covering each task.

**Schedule:**

Montgomery Watson is in the process of scheduling 5 different activities: spoil pile consolidation, temporary capping of the offsite area, PCB removal in the wetlands, onsite drum removal, and IDW drum management. The schedule breaks down as follows:

1. ORC pilot study is currently in progress.
2. Onsite drum removal is scheduled for April 23, 2001 (note the work plan is pending approval). Koester Environmental is scheduled to mobilize April 23, 2001.
3. IDW drum management work plan is pending.
4. PCB removal work plan is pending.
5. Offsite spoil management plan is pending.

**Communication:**

Pete Vagt stipulated Rob Adams will call BVSPC weekly to establish current status of events, also Pete Vagt will put together a working spread sheet detailing status of each task. The spread sheet will link task with procurement of contractor, work plan, approval of work plan, and dates of activities.

**Current Status:**

1. ORC is currently being placed in the south area by Top Flight Environmental Drilling.
2. Onsite drum removal plan is pending final comments. Koester Environmental Services is the selected contractor and will mob to the site on April 23, 2001. Koester is expected to take 4 days to completely mobilize to the site.
3. A job trailer has been brought to the site and Montgomery Watson has advised BVSPC we are welcome to set up a work station and went as far as to ask if we would have any special needs.

**Topics Of Concern:**

1. The infiltration of material in EW20 (noting the open clean out end is approximately 11 feet below ground surface).
2. Alignment and placement of EW20A, B, and C extraction wells show a serpentine alignment. The print calls for a straight line (noting the west end alignment was moved south before installation).
3. EW19 may have been compromised by installation activities, due to the fact the trencher became lodged in the extraction trench and bentonite was add to stabilize the walls.
4. Montgomery Watson was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
5. Installation of the abandonment casing around ATMW-4D is suspect as to it's effectiveness due to the fact that the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.

**Concern Resolution:**

1. Extraction well integrity will be evaluated with a down hole camera (has been delayed until further notice).
2. Alignment of the well will be verified with the as built drawings supplied by Hansen

- Engineering (pending).
3. Onsite excavation Health & Safety problem was handled with communication from Kevin Adler to Montgomery Watson and through the reinstating of the weekly construction coordination meeting. Additionally, three key items will take place to ensure safety is upheld:
    - A. Morning tail gate safety meetings.
    - B. Established site safety coordinator.
    - C. A personnel chart listing staff responsible with each activity.

**Upcoming Activities:**

1. April 23, 2001 Koester Environmental will mobilize to the site for onsite drum removal.

Signature: Margaret E. Mulkerrin  
Chad Gailey

Date: April 13, 2001  
Date: April 12, 2001

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**Weekly Oversight Summary Report No. 7**  
**ACS Superfund Site WA30, 46526.238**

**Reporting Period:** Week of April 16, 2001

**BVSPC O/S Dates:** April 17 and 19 (Mr. Gailey), 2001

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson, Warrenville, IL	3	Respondent's General Contractor
Black & Veatch Special Projects Corp. (BVSPC)	2	USEPA Oversight Contractor
Top Flight Environmental Drilling	2	Geoprobe contractor

## Construction Activities

### Major Activities:

- ORC injection in the south area (Montgomery Watson with Top Flight Drilling).
- Review of Montgomery Watson/Koester buried drum removal plan.
- Weekly construction coordination meeting at Montgomery Watson office in Warrenville.

### Activities Performed:

Montgomery Watson's one man field crew over saw ORC injection in the south area. ORC injection was stopped on Monday April 16, 2001 because Top Flight Environmental was unable to produce documentation of their health and safety training and medical monitoring upon request of Lee Orosz (Montgomery Watson's onsite health & safety coordinator). Top Flight was able to provide the necessary documentation and returned to ORC injection on April 18, 2001.

Montgomery Watson's construction coordination meeting took place on April 19, 2001 at the Montgomery Watson office in Warrenville. The meeting covered a recap of last week's meeting, health & safety, air monitoring plan, status of drum pad #1, project schedule, drum removal work plan, database format for drum removal, schedule, and miscellaneous items. The meeting activities are summarized in a memorandum attached to this weekly status report; also attached is a fax from Montgomery Watson of action items to be corrected in the final work plan for Monday's kickoff meeting. Items unresolved are 1) the minimizing of volatilization at the fire pond, 2) open excavation during non-drum removal activities, and 3) a contingency plan for stabilizing the foundation of the ~~E-approxidation~~ building during drum removal activities in area B.

*Epoxidation*

### Health & Safety:

Top Flight Environmental Drilling worked from April 11 through April 16, 2001 without proper health & safety documentation. Montgomery Watson's health & safety onsite coordinator, after returning to the site on Monday 16, 2001, stopped work until Top Flight personnel were able to produce the necessary documentation.

**Schedule:**

1. ORC pilot study is currently in progress.
2. Onsite drum removal kickoff meeting is scheduled for April 23, 2001.
3. IDW drum management work plan is finalized.
4. PCB removal work plan is pending.
5. Offsite spoil management plan is pending.

**Topics Of Concern:**

1. The infiltration of material in EW20 (note - the open clean out end is approximately 11 feet below ground surface).
2. Alignment and placement of EW20A, B, and C extraction wells show a serpentine alignment. The print calls for a straight line (note - the west end alignment was moved south before installation).
3. EW19 may have been compromised by installation activities because the trencher became lodged in the extraction trench and bentonite was add to stabilize the walls.
4. Montgomery Watson was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
5. Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.

**Concern Resolution:**

1. Extraction well integrity will be evaluated with a down hole camera (has been delayed until further notice).
2. Alignment of the well will be verified with the as built drawings supplied by Hansen Engineering (pending).
3. Onsite excavation Health & Safety problem was handled with communication from Kevin Adler to Montgomery Watson and through the reinstating of the weekly construction coordination meeting. Additionally, three key items will take place to ensure safety is upheld:
  - A. Morning tail gate safety meetings by each subcontractor with a check off list.
  - B. Established site safety coordinator.
  - C. A personnel chart listing staff responsible with each activity.

**Upcoming Activities:**

1. April 23, 2001, Koester Environmental will mobilize to the site for onsite drum removal and kick off meeting. The kick off meeting will include an updated work plan, establishing the hospital route with a dry run, and orientation to the site.
2. Joint health & safety meeting will take place between ACS, MWCI, and KES.

Signature: Chad Gailey

Date: April 26, 2001

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ACTION ITEMS FROM  
WEEKLY CONSTRUCTION MEETING - APRIL 19, 2001 MEETING  
AMERICAL CHEMICAL SERVICES NPL SITE

MEETING DATE: April 19, 2001

MEETING TIME: 10:00 AM

MEETING LOCATION: Montgomery Watson, Warrenville, Illinois Office

ATTENDEES:

Kevin Adler - U.S. EPA  
Sean Grady - IDEM (Telephone)  
Chad Gailey - Black & Veatch  
Robert Adams - Montgomery Watson  
Tom Tinics - Montgomery Watson  
Peter Vagt - Montgomery Watson  
Matt Grostick - Montgomery Watson (Telephone)  
Tom Froman - ACS (Telephone)  
Jan Schuler - Koester  
Erin Blankenberger - Koester (Telephone)  
Doye Cox - Koester (Telephone)  
Maureen Handler - Koester (Telephone)

ACTION ITEMS

Health and Safety

- Montgomery Watson will complete Health & Safety Memorandum integrating Montgomery Watson, ACS Facility, and Koester Environmental Services (KES) individual Health & Safety Plans.
- KES will bring to site their respirator fit test documentation complying with current OSHA regulations.
- Montgomery Watson will bring to site respirator fit test documentation complying with current OSHA regulations.
- Montgomery Watson will setup designated shelf space for the Health & Safety Plan and supporting documentation.
- Montgomery Watson will develop a checklist and sign in sheet for daily tailgate (toolbox) health and safety briefings.

Drum Removal

- Montgomery Watson will provide Weekly Update #4 to U.S. EPA. Weekly Update #4 will contain information regarding the proposed drum removal.

- U.S. EPA will distribute Weekly Update #4 to the standard mailing list and telephone the Town of Griffith "Father's and Mothers".
- Montgomery Watson will notify Griffith Fire Chief George Thiel (219-924-7500-32) of the drum removal by Monday, April 23, 2001 and invite him to the Safety Meeting on April 23, 2001. Montgomery Watson will also obtain Police Department contact information from Griffith Fire Department and notify Police Department.
- KES will update their organization chart showing the revised reporting roles and for their site safety personnel by April 23, 2001. *2/7, 2001*
- Montgomery Watson will develop a phone and contact list for project staff. This list will include office phone, home phone/hotel phone, mobile phone, and fax numbers for Montgomery Watson, KES, U.S. EPA, IDEM, and Black & Veatch. The list will be completed at the Pre-construction Meeting and finalized by April 26, 2001 (Start of Excavation).
- KES will update their Hospital Route Map. *2/7/01*
- KES will notify the hospitals of the drum removal work. *2/7/01*
- KES will revise their Work Plan and Health and Safety Plan to address Agency comments. *2/7/01*

#### Look Ahead Schedule

- April 23, 2001 – KES will mobilize at 8:30 AM. Pre-Construction meeting at 2:00 PM.
- April 25, 2001 – Health & Safety Kick-off Meeting for Drum Removal at 10:00 AM. To include ACS Facility, KES personnel, MWA personnel, and Agency oversight personnel. This meeting will include driving the route to the hospital.
- April 26, 2001 – Begin excavation for drum removal. Weekly Construction Meeting at 10:00 AM
- General Drum Removal Schedule Information:
  - Anticipate working 10 hours/day, 5 days/week.
  - Daily Tailgate Safety Meeting @ 7:00 AM. Anticipate working until 5:00 PM
  - Anticipated Duration: 2 Months (Based on 40 drums per day).

*Site Safety Conference meeting 8:00 Start Thursday*

**NEXT MEETING:** Thursday, April 26, 2001 at 10:00 AM at ACS Construction Trailer.

RAA/PIV

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**Weekly Oversight Summary Report No. 8**  
**ACS Superfund Site WA30, 46526.238**

**Reporting Period:** Week of April 23, 2001

**BVSPC O/S Dates:** April 23 (Mr. Gailey), April 25 (Mr. Gailey & Ms. Mulkerrin) and April 26 (Mr. Campbell & Ms. Mulkerrin), 2001

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson, Warrenville, IL	7	Respondent's General Contractor
Black & Veatch Special Projects Corp. (BVSPC)	3	USEPA Oversight Contractor
Austgen Electrical	4	Electrical Contractor/Drum Pad Grounding System & Sump Pump Installation
Security Fence	2	Fencing Contractor/Installation of Entrance Gate
Koester Environmental Services	7	Drum Removal Contractor
Top Flight Environmental Drilling	2	Geoprobe Contractor

## **Construction Activities**

### **Major Activities:**

- ORC injection in the south area (Montgomery Watson with Top Flight Environmental Drilling).
- Drum removal kick-off meeting
- Health & safety orientation for buried drum removal
- Begin drum removal
- Weekly construction coordination meeting

### **Activities Performed:**

Montgomery Watson's one person field crew observed ORC injection in the south area (South Array3). The presence of a large gas pipeline along the northern edge of South Array 3 will force the array to be modified as a 20' offset is required, preventing the application of ORC in this vicinity. To compensate for this lost area, Montgomery Watson is planning on using the triangle area bordered by Colfax Road on the east, the property

fence line on the west, and the stop sign at the intersection of Colfax and Reder Roads to the south. Stela Williams, of Montgomery Watson, informed Black & Veatch that as of April 25, 2001, there were 18 days left to complete the ORC application. Pete Vagt, of Montgomery Watson, stated that the project was slightly behind schedule, and they are looking to extend the ORC schedule approximately one more week.

Monday, April 23, 2001 a kick-off meeting for the drum removal took place at ACS. The toolbox safety meeting at 7:00 a.m., as well as the 8:00 a.m. meeting of the Health & Safety Supervisors were reinforced. Air monitoring information will be exchanged among all parties (ACS, Montgomery Watson, and Koester) on a daily basis, and the information will also be posted in the construction trailer. Communication between ACS and the contractors on this project was reviewed as well. ACS will provide radios to Montgomery Watson and Koester to relay any emergency information. The spoil/drum placement was reviewed and it was stated that it is Montgomery Watson's decision as to the placement of these materials (i.e., roll off box, firepond, overpack drum).

Wednesday, April 25, 2001, the health & safety orientation for the drum removal was held in the GWTP at the ACS site. All Montgomery Watson and Koester personnel involved in the removal actions were present. Items covered include: ACS emergency protocol, location of MSDS information, PPE required, the donning and doffing of PPE, exclusion zone rules, and general removal/excavation safety procedures. An agenda of the orientation is attached. The meeting was followed by a hospital route dry run, and route maps were distributed. The drum removal exclusion zone for Area A was established, and Austgen Electrical was working on the installation of the drum pad sump pump, and the drum pad grounding system.

The excavation was set to begin on Thursday, April 26, 2001, for the Drum Removal. The daily toolbox meeting took place at 7:00 a.m. and was led by Maureen Handler of Koester. The weekly construction meeting took place at the construction trailer at the ACS site. Rob Adams went over the resolutions of the action items remaining from the April 19, 2001, meeting (see attached). The EPA requested that a copy of the air monitoring results be sent to them every two weeks. It was stated that any new contractor on site must go through a health & safety orientation with Lee Orosz before beginning work, and daily toolbox safety meetings should be held by every contractor, but it was the contractor's responsibility to do so. Koester administered the final revised Health & Safety Plan for the drum removal. This plan incorporated the required changes discussed at the April 19, 2001 meeting. A new Koester personnel chart was included in the plan showing RJ Futrell as the Health & Safety technician who will be responsible for onsite health & safety monitoring as well as holding the daily meetings. Following the meeting, a tour of the site was given to Kevin Adler (EPA), Sean Grady (IDEM), Larry Campbell (BVSPC), and Margaret Mulkerrin (BVSPC). Peter Vagt, Tom Tinics, and Rob Adams, all of Montgomery Watson, conducted the site walk. The tour included viewing the planned layout for the proposed PCB removal located in the wetlands on the western side of the property. Next, a walk over to the south offsite area led to discussion of the methods for constructing a sedimentation basin in the northwest corner of this area. An existing drainage swale that runs along the west and north portion of the south offsite area will be modified to create the basin, with a controlled outlet which will discharge to the west. Koester did not begin excavating on the 26<sup>th</sup>, as Austgen was still onsite working on the electrical, and Koester was changing out equipment, setting up their construction trailer, and decontamination zone.

**Schedule:**

1. ORC pilot study is currently in progress.
2. Onsite drum removal excavation will begin by end of week.
3. IDW drum management work plan is finalized.
4. PCB removal work plan is pending.
5. Offsite spoil management plan is pending.

**Topics of Concern:**

1. The infiltration of material in EW20 (note - the open clean out end is approximately 11 feet below ground surface).
2. Alignment and placement of EW20A, B, and C extraction wells show a serpentine alignment. The print calls for a straight line (note - the west end alignment was moved south before installation).
3. EW19 may have been compromised by installation activities because the trencher became lodged in the extraction trench and bentonite was added to stabilize the walls.
4. Montgomery Watson was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
5. Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.

**Concern Resolution:**

1. Extraction well integrity will be evaluated with a down hole camera (delayed until further notice).
2. Alignment of the EW20 wells will be verified with the as built drawings supplied by Hansen Engineering (pending).
3. Onsite Health & Safety concerns were addressed by Kevin Adler. The following items shall be instituted to ensure safety is upheld:
  - A. Tail gate safety meetings will be held every morning by each subcontractor which will include reviewing a standard check off list.
  - B. A site safety coordinator will be established
  - C. A personnel chart shall be created, listing staff persons and the activities for which each are responsible.

**Upcoming Activities:**

1. Koester Environmental will continue buried drum removal activities.
2. Offsite spoil management/regrading will be occurring, at a date not yet specified.
3. PCB removal tentatively schedule to start late spring; date not yet finalized.

Signature: Margaret Mulkerrin

Date: May 1, 2001

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# Health & Safety Orientation Agenda

## Buried Drum Removal at ACS Griffith IN.

### 04-25-2001

All personnel, workers, visitors or otherwise, shall sign in at the GWTP every day upon arrival, it is not necessary to sign out. If you have not yet done that, please do it now.

Introduction: Pete Vagt:

- A. Site history....
- B. Final Remedy
- C. How we (MW), you, and this project all fit together.

ACS: Doug Draia / Tom Froman:

- A. General site safety ...per your typical safety protocol.
- B. Communication via radio with Matt Grostick of MWA and Koesters Supervisors.
- C. Locations of MSDS' within the facility under the hazard communication standard.

General Site safety: Lee Orosz

- A. Hard hats, safety shoes, glasses.
- B. Eating, Drinking, Smoking, Chewing
- C. Tobacco, Alcohol, Controlled substances, Firearms
- D. MSDS' for GWTP, location, first aid, eye wash, emergency showers.
- E. NO reason for anyone being in the GWTP without specific instructions to be there.
- F. Daily Tool Box Meetings

Site Specific Safety: Matt Grostick:

- A. Hard hats, safety shoes, safety glasses
  - 1. Fire Safety, Police
  - 2. Communication via radio with ACS, Koester supervision and MWA
- B. PPE-Specific
  - 1. Level "B" (define) where is this applicable
  - 2. Level "C" (define) where is this applicable
  - 3. Fit Testing
  - 4. Demonstration of proper Level "B" (Jamie Bergeron)
- C. Exclusion Zone
  - 1. Air Monitoring
  - 2. Access controls, sign in and out, Decon for personnel, and equipment
  - 3. Personal Hygiene
  - 4. Buddy System, and heat stress

D. Excavations

1. OSHA Regulations
  - A. 4 foot plus rules
  - B. Side walls and slope
  - C. Lifting techniques, let the machine do as much as possible
  - D. Heavy equipment safety zones
  - E. Utility locations

E. Sampling

1. Bonding
2. Non spark tools
3. Remote access of drums for sampling... IE ram punch on back/track hoe with blast shielding.
4. Evacuate the excavation and exclusion zone during remote accessing.
5. HAZ CAT- Reserve for the managers meeting.
6. MSDS' for Koesters Haz Cat operations.
7. Trip to the Hospital by management.

ACTION ITEMS FROM  
DRUM REMOVAL PRE-CONSTRUCTION MEETING  
AMERICAL CHEMICAL SERVICES NPL SITE

MEETING DATE: April 23, 2001

MEETING TIME: 2:00 PM

MEETING LOCATION: Site Trailer, ACS NPL Site

ATTENDEES:

Chad Gailey – Black & Veatch  
Robert Adams – Montgomery Watson  
Mike D'Auben – Montgomery Watson  
Travis Klingforth – Montgomery Watson  
Todd Lewis – Montgomery Watson  
Lee Orosz – Montgomery Watson  
Tom Tinics – Montgomery Watson  
Peter Vagt – Montgomery Watson  
Tom Froman – ACS  
Doug Draia – ACS  
Maureen Handler – Koester  
Jamie Bergeron – Koester

ACTION ITEMS

Health and Safety

- Montgomery Watson will complete Health & Safety Memorandum integrating Montgomery Watson, ACS Facility, and Koester Environmental Services (KES) individual Health & Safety Plans. A draft of this Memorandum is currently undergoing review by ACS and is anticipated to be complete by April 25, 2001.
- KES will bring to site their respirator fit test documentation complying with current OSHA regulations. KES' fit test documentation will be to the site on April 24, 2001 when the complete KES crew arrives.
- Montgomery Watson will bring to site respirator fit test documentation complying with current OSHA regulations. Montgomery Watson employees will be re-fit tested specifically for the Drum Removal by before entering areas requiring respirators.
- Montgomery Watson will setup designated shelf space for the Health & Safety Plan and supporting documentation. Montgomery Watson will designate a space for health and safety (H&S) documentation and a location for posting air monitoring results and other pertinent H&S information. A



location will also be designated at KES' trailer to post air monitoring results. The locations will be shown to personnel during the H&S meeting on April 25, 2001.

- Montgomery Watson will develop a checklist and sign in sheet for daily tailgate (toolbox) health and safety briefings. Montgomery Watson and KES will coordinate and combine for daily tailgate safety meeting topics and documentation.
- A H&S meeting for Site Safety Coordinators will be conducted on a daily basis, starting at 8:00 AM.

#### Drum Removal

- Montgomery Watson has completed the Field Update #4. U.S. EPA will distribute copies to the standard mailing list and telephone the Town of Griffith "Father's and Mothers".
- Montgomery Watson will notify Griffith Fire Chief George Thiel (219-924-7500-32) of the drum removal by Monday, April 23, 2001 and invite him to the Safety Meeting on April 25, 2001. Montgomery Watson will also obtain Police Department contact information from Griffith Fire Department and notify Police Department. Montgomery Watson is scheduled to telephone the Fire Department on April 24, 2001.
- KES will update their organization chart showing the revised reporting roles and for their site safety personnel by April 23, 2001. The revised organization chart will be brought to the site and submitted on April 24, 2001.
- Montgomery Watson will develop a phone and contact list for project staff. This list will include office phone, home phone/hotel phone, mobile phone, and fax numbers for Montgomery Watson, KES, U.S. EPA, IDEM, and Black & Veatch. The list will be completed at the Pre-construction Meeting and finalized by April 26, 2001 (Start of Excavation). This list is currently being compiled and will be distributed by the Construction Meeting on April 26, 2001.
- KES will update their Hospital Route Map. Montgomery Watson will provide KES an existing map by April 25, 2001.
- KES will notify the hospitals of the drum removal work. KES' Corporate Safety Officer will notify hospital on April 24, 2001.
- KES will revise their Work Plan and Health and Safety Plan to address Agency comments. The revised plans will be delivered to the site by KES on April 24, 2001.

#### Look Ahead Schedule

- April 25, 2001 – Health & Safety Kick-off Meeting for Drum Removal at 10:00 AM. To include ACS Facility, KES personnel, MWA personnel, and Agency oversight personnel. This meeting will include driving the route to the hospital.
- April 26, 2001 – Begin excavation for drum removal. Begin daily Health & Safety Meetings for Safety Officers at 8:00 AM. Weekly Construction Meeting at 10:00 AM.

- General Drum Removal Schedule Information:
  - Anticipate working 10 hours/day, 5 days/week.
  - Daily Tailgate Safety Meeting @ 7:00 AM. Anticipate working until 5:00 PM
  - Anticipated Duration: 2 Months (Based on 40 drums per day).

**NEXT MEETING:** Thursday, April 26, 2001 at 10:00 AM at ACS Construction Trailer.

RAA/pjv/RAA  
J:\209\0601 ACS\0202 MWA PM\06010202a023.doc

**Weekly Oversight Summary Report No. 9**  
**ACS Superfund Site WA30, 46526.238**

**Reporting Period:** Week of April 30, 2001

**BVSPC O/S Dates:** April 30, 2001 (Ms. Mulkerrin) and  
May 3, 2001 (Mr. Campbell & Ms. Mulkerrin)

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson, Warrenville, IL	7	Respondent's General Contractor
Black & Veatch Special Projects Corp. (BVSPC)	2	USEPA Oversight Contractor
Koester Environmental Services	7	Drum Removal Contractor
Top Flight Environmental Drilling	2	Geoprobe Contractor

## **Construction Activities**

### **Major Activities:**

- ORC injection in the south area (Montgomery Watson with Top Flight Environmental Drilling).
- Buried drum removal (Montgomery Watson with Koester Environmental Services)
- Weekly construction coordination meeting

### **Activities Performed:**

ORC injection continued in South Array 3. Stela Williams, of Montgomery Watson, observed Top Flight Environmental Drilling perform this work on a daily basis. 209 injection points have been marked out, with an additional nine spots yet to be placed. Montgomery Watson expects the ORC injection work to be complete by Tuesday or Wednesday of next week. Monthly sampling of the ORC wells will begin at the end of May.

Buried drum excavation continued in Area A. As of May 2, 2001, 46 intact drums had been removed and placed in overpacks, 333 non-intact drums had been removed and placed in roll-off boxes, 38 drums had been sampled, 13 samples had been analyzed, and 268.5 cubic yards of debris had been transported to and placed in the firepond. Montgomery Watson expects to complete the excavation in Area A and begin working in

Area B by May 14, 2001.

An audit of the Koester onsite laboratory was performed by a Montgomery Watson chemist on May 2, 2001. Montgomery Watson will be storing the samples obtained from the excavated drums on shelving built into a roll-off box located in the Filter Press Room of the GWTP. The location chosen was described as dark, cool, and secure. Lee Orosz will be responsible for regularly monitoring the area to ensure the integrity of the archived samples.

Morning activities on site included air monitoring by Montgomery Watson which, if acceptable results were found, would allow personnel to enter into the exclusion zone without the use of respiratory protection. At this time non-intrusive tasks would be performed to prepare for the day's activities. BVSPC asked Montgomery Watson if they had any concern regarding tracking contaminated materials out of the exclusion zone during these activities. Montgomery Watson stated they would institute the use of booties for these activities to prevent the spread of contamination. It was also noted by BVSPC that Montgomery Watson performed perimeter air monitoring by entering into the exclusion zone without the use of respiratory protection. When questioned on this issue, the Montgomery Watson Health & Safety Coordinator stated that the actual exclusion zone is 50 feet outside the excavation, and he stayed outside of that critical area. BVSPC intends to request that Montgomery Watson abide by all rules that apply to the exclusion zone (such as wearing Level B respiratory protection). Also, because the classified level within the drum removal exclusion zone changes from Level D to Level B, BVSPC will request that the status of the exclusion zone be clearly posted at the entrance(s) thereto.

In the weekly Construction Meeting, on May 3, 2001, Montgomery Watson discussed planning the abandonment of MW W-1 in the same fashion as ATMW-4D. Montgomery Watson will follow through with proper submittals to IDEM and the EPA before proceeding.

**Topics of Concern:**

- The infiltration of material in EW20 (note - the open clean out end is approximately 11 feet below ground surface).
- Alignment and placement of EW20A, B, and C extraction wells show a serpentine alignment. The print calls for a straight line (note - the west end alignment was moved south before installation).
- EW19 may have been compromised by installation activities because the trencher became lodged in the extraction trench and bentonite was added to stabilize the walls.
- Montgomery Watson was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.
- Personnel have entered exclusion zone without respiratory protection before the area had been cleared for reduced PPE.

**Concern Resolution:**

- Extraction well integrity will be evaluated with a down hole camera (delayed until further notice).
- Alignment of the EW20 wells will be verified with the as built drawings supplied by Hansen Engineering (pending).
- Onsite Health & Safety concerns were addressed by Kevin Adler. The following items shall be instituted to ensure safety is upheld:
  1. Tail gate safety meetings will be held every morning by each subcontractor which will include reviewing a standard check off list.
  2. A site safety coordinator will be designated.
  3. A personnel chart shall be created, listing staff persons and the activities for which each are responsible.

**Upcoming Activities:**

- Koester Environmental anticipates being complete with Area A, and continuing onto Area B.
- Offsite spoil management/regrading expected to begin mid-May.
- Abandon Monitoring Well W-1.

Signature: Margaret Mulkerrin

Date: May 14, 2001

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Site: American Chemical Services, Inc.

Project: 46526

Photo: 1 Roll: 6

Date: 4-3-01 Time: 10:20

Photographer: Margaret Mulkerrin

Description: Photo facing southwest in south offsite area.  
Dave's Tree Service performing clearing &  
grubbing.





Site: American Chemical Services, Inc.

Project: 46526

Photo: 2 Roll: 6

Date: 4-3-01 Time: 10:30

Photographer: Margaret Mulkerrin

Description: Photo facing north in south offsite area.

Staging of IDW barrels along north fence  
line.

Site: American Chemical Services, Inc.

Project: 46526

Photo: 3 Roll: 6

Date: 4-3-01 Time: 10:45

Photographer: Margaret Mulkerrin

Description: Photo facing west in onsite area. Picture of  
drum staging pad.





Site: American Chemical Services, Inc.

Project: 46526

Photo: 4 Roll: 6

Date: 4-5-01 Time: 11:13

Photographer: Chad Gailey

Description: Photo facing northwest in onsite area. Ryan  
Construction excavating trench between  
areas "A" & "C".

Site: American Chemical Services, Inc.

Project: 46526

Photo: 5 Roll: 6

Date: 4-5-01 Time: 11:37

Photographer: Chad Gailey

Description: Photo facing north at new MW-55  
(replacement for ATMW-4D). Mid-  
American Drilling mixing grout.





Site: American Chemical Services, Inc.

Project: 46526

Photo: 1 Roll: 7

Date: 4-12-01 Time: 09:26

Photographer: Chad Gailey

Description: Photo facing north at Reder Rd. & Colfax Rd. Top Flight Environmental Services pushing probes.



Site: American Chemical Services, Inc.

Project: 46526

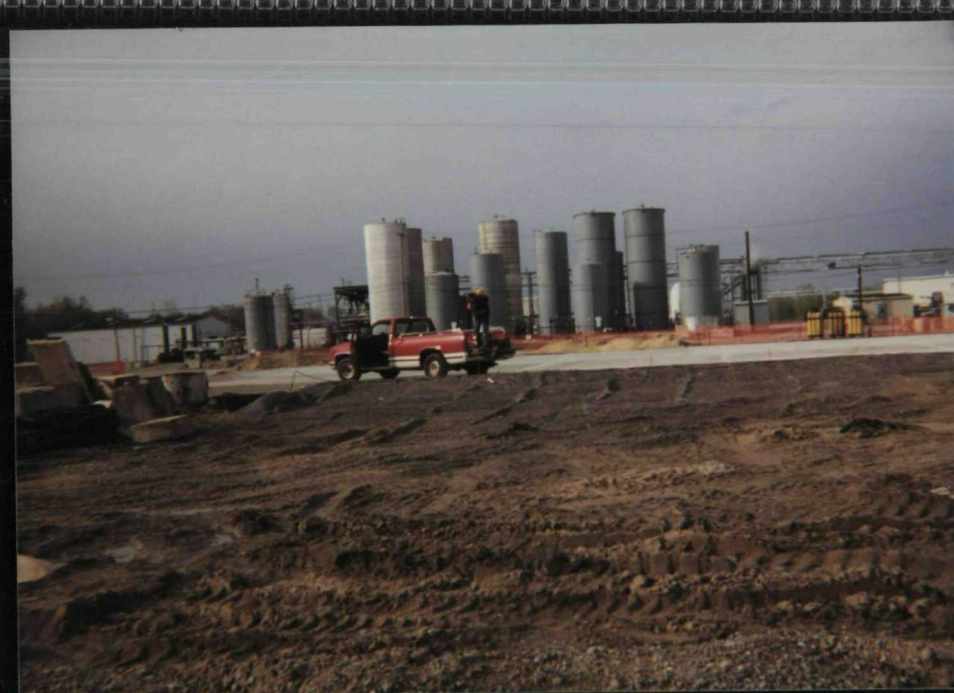
Photo: 2 Roll: 7

Date: 4-12-01 Time: 09:26

Photographer: Chad Gailey

Description: Photo facing northwest at Reder Rd. & Colfax Rd. Top Flight Environmental Services mixing ORC for injection.





Site: American Chemical Services, Inc.

Project: 46526

Photo: 3 Roll: 7

Date: 4-12-01 Time: 13:54

Photographer: Chad Gailey

Description: Photo facing west at 1002 Reder Rd. ORC injection.

Site: American Chemical Services, Inc.

Project: 46526

Photo: 4 Roll: 7

Date: 4-25-01 Time: 08:09

Photographer: Chad Gailey

Description: Photo facing south at north edge of onsite area. Augsten Electric installing grounding rod for drum staging pad.





Site: American Chemical Services, Inc.

Project: 46526

Photo: 5 Roll: 7

Date: 4-25-01 Time: 09:09

Photographer: Margaret Mulkerrin

Description: Photo facing south on onsite area. Koester & Montgomery Watson personnel locating stub of drainage pipe.

Site: American Chemical Services, Inc.

Project: 46526

Photo: 6 Roll: 7

Date: 4-30-01 Time: 08:30

Photographer: Margaret Mulkerrin

Description: Photo facing southwest of onsite area "A" excavation for buried drum removal.





5

Photo #

Site: American Chemical Services, Inc.

Project: 46526

Photo: 7 Roll: 7

Date: 4-30-01 Time: 08:30

Photographer: Margaret Mulkerrin

Description: Photo facing southwest of onsite area "A"  
excavation for buried drum removal.

6

Photo #

Site: American Chemical Services, Inc.

Project: 46526

Photo: 8 Roll: 7

Date: 4-30-01 Time: 08:30

Photographer: Margaret Mulkerrin

Description: Photo facing southwest of onsite area "A"  
excavation for buried drum removal.





Site: American Chemical Services, Inc.  
 Project: 46526  
 Photo: 9 Roll: 7  
 Date: 4-30-01 Time: 08:30  
 Photographer: Margaret Mulkerrin  
 Description: Photo facing west of onsite area "A"  
 excavation for buried drum removal.



Site: American Chemical Services, Inc.  
 Project: 46526  
 Photo: 10 Roll: 7  
 Date: 4-30-01 Time: 08:30  
 Photographer: Margaret Mulkerrin  
 Description: Photo facing east on onsite area. Picture of  
 firepond.





6 #0104H

Site: American Chemical Services, Inc.

Project: 46526

Photo: 11 Roll: 7

Date: 4-30-01 Time: 08:30

Photographer: Margaret Mulkerrin

Description: Photo facing northeast on onsite area.  
Picture of north end of firepond.

01 #0104H

Site: American Chemical Services, Inc.

Project: 46526

Photo: 12 Roll: 7

Date: 4-30-01 Time: 09:00

Photographer: Margaret Mulkerrin

Description: Photo facing north at area "A" in onsite  
area. Koester placing drum in overpack.





Site: American Chemical Services, Inc.

Project: 46526

Photo: 1 Roll: 8

Date: 4-30-01 Time: 13:00

Photographer: Margaret Mulkerrin

Description: Photo facing north in onsite area. Drum  
excavation in Area "A".





Site: American Chemical Services, Inc.

Project: 46526

Photo: 2 Roll: 8

Date: 4-30-01 Time: 13:30

Photographer: Margaret Mulkerrin

Description: Photo facing north in onsite area. Drum  
being placed in overpack in Area "A".

Site: American Chemical Services, Inc.

Project: 46526

Photo: 3 Roll: 8

Date: 4-30-01 Time: 13:45

Photographer: Margaret Mulkerrin

Description: Photo facing north in onsite area. Koester  
removing drum in Area "A" using sling.





Site: American Chemical Services, Inc.  
Project: 46526  
Photo: 4 Roll: 8  
Date: 5-3-01 Time: 11:45  
Photographer: Margaret Mulkerrin  
Description: Photo facing north. Drum carcasses being  
placed in rolloff box in Area "A".



Site: American Chemical Services, Inc.

Project: 46526

Photo: 5 Roll: 8

Date: 5-3-01 Time: 13:30

Photographer: Margaret Mulkerrin

Description: Photo facing north. Picture of drums from  
Area "A" being placed on staging pad.

Site: American Chemical Services, Inc.

Project: 46526

Photo: 6 Roll: 8

Date: 5-3-01 Time: 14:00

Photographer: Margaret Mulkerrin

Description: Photo facing north. Drum excavation in  
Area "A".





Site: American Chemical Services, Inc.

Project: 46526

Photo: 7 Roll: 8

Date: 5-3-01 Time: 14:30

Photographer: Margaret Mulkerrin

Description: Photo facing south. Firepond outfall and contents in onsite area.







8 9 1044

Site: American Chemical Services, Inc.

Project: 46526

Photo: 8 Roll: 8

Date: 5-3-01 Time: 14:35

Photographer: Margaret Mulkerrin

Description: Photo facing south. Overall view of  
firepond in onsite area.

Site: American Chemical Services, Inc.

Project: 46526

Photo: 9 Roll: 8

Date: 5-8-01 Time: 07:15

Photographer: Margaret Mulkerrin

Description: Photo facing north. Excavation in Area "A".



Site: American Chemical Services, Inc.

Project: 46526

Photo: 10 Roll: 8

Date: 5-8-01 Time: 07:45

Photographer: Margaret Mulkerrin

Description: Photo facing north. Sampling of  
overpacked drum on drum staging pad in  
onsite area.





Site: American Chemical Services, Inc.

Project: 46526

Photo: 11 Roll: 8

Date: 5-8-01 Time: 07:45

Photographer: Margaret Mulkerrin

Description: Montgomery Watson personnel in Area "A"  
exclusion zone.

PHOTO 11

Site: American Chemical Services, Inc.

Project: 46526

Photo: 12 Roll: 8

Date: 5-8-01 Time: 14:00

Photographer: Margaret Mulkerrin

Description: Photo facing north. Removed drum being  
placed in overpack in Area "A".





Site: American Chemical Services, Inc.

Project: 46526

Photo: 13 Roll: 8

Date: 5-8-01 Time: 14:05

Photographer: Margaret Mulkerrin

Description: Photo facing north. Removed drum being placed in overpack in Area "A".





Site: American Chemical Services, Inc.

Project: 46526

Photo: 14 Roll: 8

Date: 5-10-01 Time: 09:20

Photographer: Margaret Mulkerrin

Description: Photo facing north in onsite area. Koester  
sampling overpacked drums on drum  
staging pad.

Site: American Chemical Services, Inc.

Project: 46526

Photo: 15 Roll: 8

Date: 5-10-01 Time: 09:21

Photographer: Margaret Mulkerrin

Description: Photo facing north in onsite area. Koester  
sampling overpacked drums on drum  
staging pad.

(102) Margaret E. Mulkerin 4/3/01

800 Arrive at ACS. Weather: overcast, 35°F. light wind. Briefly survey the site: concrete drum pad is partially complete, no one working on it yet today. Clearing + grubbing is taking place in the south area.

830 Arrive at water treatment building.

Spoke (very briefly) with Tom Tinics.

Tom was happy w/ how clearing + grubbing was going. Drum pad almost finished. Someone dug an incorrect swamp yesterday which set them back - currently working on a remedy for that. Midwest Environmental & Mid America drilling are on site, but not yet working... meeting w/ Todd Lewis.

1000 Observe Dave's Tree Service. Most clearing is completed in south area, mostly chipping today.

1020 Picture 1 Role 6: Dave's Tree Service clearing/grubbing south area

1030 Picture 2 Role 6: Staging of barrels in south area along northern fence line

1045 Picture 3 Role 6: Facing west at onsite area. Picture of drum staging pad.

Margaret E. Mulkerin

Margaret E. Mulkerin 4/3/01 (103)  
11:15 Personnel Onsite: (per sign in book)

TOM TINICS MWCI

MARK LEVICK MWCI

CHAD SMITH MWA

TODD LEWIS MWCI

K. FIELD MEI

ERIC KAEHN MAD

JOE ADAMS MWA

LISA HALL MWA

TOM BARZIK "

RICH WEDER "

RICH JOHNS "

PHIL KESSACK "

ERNIE MASCHNER MWCI

DAN CARPENTER MWA

KEITH JOHNSTON MWA

GUS MERCENTHALER MWA

JOE CANTOES "

R. ORTIZ "

M. PERTIE MWCI

LEE OROSZ

JAMES NORTON MW

MARGARET MULKERRIN BVSPC

Margaret E. Mulkerin



(104) Margaret E. Mulkerin 4/3/01  
1120 Tom Tinics & I went to the south end of the south offsite area where Mid America has been drilling. Spoke w/ Chad Smith of MNA. Chad said they will drill the three wells on the west side of Calfax Today. The other two wells (one on the NE corner, and one on the SE corner of Calfax + Reder) will be done tomorrow. The ORC applications should begin next Wednesday, 04/11/01. There are 35 applications, he expects to be able to do 10/per day. I inquired about the workplan & if there was an approved copy available. Chad stated he had a copy of the plan; it was only a short letter. No approval mark was on it. Chad stated the letter of approval from the EPA was in the office. Tom said he would call Rob Adams or Travis & have one sent to B+V ASAP.

11:45 Spoke with Tom back at Tx. Plant regarding upcoming schedule. Once clearing & grubbing is done in south area, regrading will begin, including detention. The drums  
Margaret E. Mulkerin

4/3/01 Margaret E. Mulkerin (105)  
Shown in Picture 2 roll 6 are from the preliminary investigations in the offsite area. They were previously stored at the onsite area, but were moved due to the construction of the drum staging pad & because these drums will be put with the spoils piles before the regrading, and then capped over. Tom plans on the SVE system to be in operation by the middle of July. As for the onsite area, the pad is near completion with two sections poured & one remaining to be formed up & poured. The schedule states that the pad will be ready for usage on 4/23/01. Koester, who is doing drum removal, should be ready to start then. No construction meeting this week. Next week 4/12/01 will be the next meeting.

1230 Left site for lunch

1315 Returned to site. Called Larry Campbell and discussed information gathered at site today.

1330 Observed Mid America drilling install wells. They installed two wells on the City of Griffith property, just  
Margaret E. Mulkerin

(106) Margaret E. Mulken 4/3/01  
south of the state offsite area.  
1530 Leave site

Margaret E. Mulken  
04/03/01

(107)

Chad S. Salyer 04/03/01  
10:30 ARRIVED ON SITE @ WATER TREATMENT  
Bldg., WEATHER, Sunny for 49°F  
Breezy.

### Activities Today

- 1) Onsite Staging Drum Pail  
Pouring.
- 2) Installation of New Well  
To Replace ATMW 4D,  
ATMW 4D Has Been trampled  
located, Later Today CHAD  
Plans on sinking 8" casing  
around ATMW 4D, To  
INSURE NO migration to  
lower aquifer from upper.
- 3) OFF SITE AREA POWER IS BEING  
RAN TO THE BLOWER SHED AREA.
- 4) DAVE'S TREE SERVICE is  
Chipping To Collect MATERIAL.

10:40 Drove over to observe offsite  
work, DAVE'S Tree Service.

11:12 Onsite AREA, walk up on 66 foot  
open trench 2' X 3 deep.  
No Barriers AROUND trench  
No Air Monitoring.

Chad S. Salyer

108

Chad Selig 4/6/01

11.13

Picture 4 R/E 6 Facing NW @  
OFF-Site AREA of RYAN Co EXCAVATING  
A TRENCH  
NOTE TRENCH IS EXCAVATED BETWEEN  
AREA C & A,

BARRY CHAD SMITH'S PFD, & RAN ACROSS  
SOIL IN THE ON-SITE AREA EXCAVATING  
SOIL pulled 0.7 - 0.1 ppm,  
Breathing Zone 0.1 - 0.3 ppm.  
WHEN NO EXCAVATION WAS BEING DONE.  
ASK TOM TINKS, ABOUT REPAIRING  
THE AREA, OFF, TOM SAID NO. WE  
TOLD AKS WERE OUT HERE AND THEY'LL  
STAY AWAY. LHS A FORK TRUCK DRIVES  
NEXT TO THE OPEN EXCAVATION.  
AND FOR AIR MONITORING THEY PERFORM  
AIR MONITORING INITIAL, WITH NO REAL  
READUP. WORK STOPPED.

11.35

MID AMERICAN DRILL HAS COMPLETE  
SELLER SCREEN & RISEN, WELL 40 FT  
W/ 40 FT SCREEN SLOT & OIL.

11.37

Picture 5 R/E 6 Facing N @  
NEW AT&T-4D WELL @ M.D. AREA.  
DRILLING MIXING GROUT.

Chad Selig

109

Chad Selig 4/6/01

11.42

PERSONNEL PRESENT:

LEE CROSS	MWCI Plant Operator
MIKE RUSSELL	RYAN
JASON NOWBZEL	RYAN
BRENNAN S. SUTCHMAN	RYAN
CHAD SMITH	MWA
CHARLES LOCKWOOD	MAD
ERIC KAELEN	MAD
OMAR RODRIGUES	DAVES TREE S
JIM TOWER	"
MARL ZELMER	"
CARL ADAMS	"
DAVE JOHNSON	"
TOM TINKS	MWCI

11.45

TALK W/ TOM TINKS ABOUT  
SCHEDULE, BECAUSE NO CORANATION  
MEET TOOK PLACE TODAY.  
APRIL 9, WEATHER PERMITTING  
WILL START OFF-SITE SOIL CONSULTATION  
BY MIDWEST ENVIRONMENTAL.  
APRIL 16, KCESTER ENVIRONMENTAL  
WILL MOB TO SITE FOR DRUM RECOVERY.  
APRIL 10 MWA MAY SAMPLE THE  
INITIAL SAMPLING ROWS.

Chad Selig

(110)

Chad Saly 04/05/01

April 11 ORE may also START  
with injections.

12:15 RYM 13 Popping Concrete in  
Third Section of Staging PAD. —

13:30 CHAD SMITH AND MAID STARTED  
OVER DRILLING ATMLW-41D

14:48 TRYING to Drive the Casing  
— ASK CHAD SMITH how he  
PLANNED to Tremmie Grant the  
ANNULUS of Pip. when they Pulled  
Augers. They will over Drill  
the New Casing to prevent large  
Amount of Se. Between them.  
Flush, then bloat. —

This is not the proper SOP for  
well abandonment per QAPP. —

15:30 Left Site. —

~~Chad Saly  
04/05/01~~

(110)

Chad Saly 04/05/01

April 11 ORC may also START  
with injections.

12:15 Ryan is Popping Concrete in  
third section of staging Pad.

13:30 CHAD, Smith and MAID started  
OVER Drilling ATTW-41D

14:48 TRYING to Drive the Casing  
I Ask Chad Smith How he  
Planned to Tremmie Giant the  
ANNULUS of Tipi when they pulled  
Augers. They will over Drill  
the New Casing to prevent large  
Amount of soil between them.  
Flush, then bloat.

This is not the proper SOP for  
well abandonment per QAPP.

15:30 Left Site.

~~Chad Saly~~  
04/05/01

(111)

Chad Saly 04/12/01

7:22 ARRIVED ON Site @ ACS WTB,  
WEATHER, Temp 52°F, Windy, Overcast.  
Activities Today.

1) ORC Injection in the At South  
AREA.

2) Construction COORDINATION MEETING.

9:26 Picture 1 Role 7, Facing North @  
Recler + Colfax of Top Flight  
Environmental Drilling Services, pushing  
probs.  
Picture 2 Role 7, Facing South East  
@ Recler + Colfax of Top Flight mixing  
ORC for injection.

10:00 Drove over to WTB for meeting  
with MW:

Rob Adams

Pete Vagot

Tom Tines

Chad Gmiley

I will Transcribe Note to Log  
Book. @ END DAY.

12:03 FINISHED MEETING

12:11 TALKING to Ruby STERN  
About ORC.

Chad Saly

(112)

Chad Lutz 04/12/01

13:11

Back From lunch, @ ORC AREA  
AT CORNER of Recker Rd + Colfax  
1002 Recker, located in SW

Corner of property.

13:47

1st ARRIVAL Back To ORC injection  
After Call Mr. Campbell about site  
status.

13:57

ORC is inject @ 10 lbs / per hour.  
Picture 3 Roll 7. Facing W @ 1002  
Recker @ ORC Injection.

14:39

Help Recker Load ORC Buckets.

13:00

Leave Site for Day.

Chad Lutz  
04/12/01

(113)

Margaret E. Mulkerin 04/13/01

10:40AM ARRIVED @ ACS site

PERSONNEL PRESENT:

RUDY STEIN MWA

MARK CLARK TOPLIGHT

TOM TINIUS MWCI

MARGARET MULKERRIN DVSPC

10:45 TOM TINIUS INFORMED ME THE <sup>MS</sup>INSTALLATION  
OPERATION OF THE ORC APPLICATION HAS  
BEEN DELAYED B/C THE GEOPROBE WAS  
BROKEN THIS MORNING

10:45 RYAN CONSTRUCTION WAS REPLACING A

PORTION OF THE DRUM PAD THAT WAS NOT  
DRAINING CORRECTLY. RYAN USED A THREE  
DAY MIX ON THIS PORTION

11:15 SPOKE W/ TOM ABOUT UPCOMING EVENTS.

THE DRUM REMOVAL WILL NOT BEGIN UNTIL  
4/23/01. THE PREPARING OF THE SOUTH  
OFFSITE AREA IS ALSO POSTPONED UNTIL THEY  
FINALIZE A CONTRACTOR + WORK PLAN.

11:30 LEAVE SITE

Margaret E. Mulkerin

(114)

Chas. S. Galt 04/17/61

7:00 ARR. VED @ AC'S (Groundwater treatment)  
R.C. WEATHER TEMP 31°F partly sunny  
winds, —

\* ACTIVITIES TODAY will be CRC  
injection in the South AREA. —

7:22 TALK TO LEE CROSS ABOUT STATUS  
OF CRC. LEE SAID HE ASKED  
TOP FLIGHT FOR their Medical Supervisor  
AND HAZWOPER AND they could  
only come up w/ ONE PERSONS NOT  
the others. LEE DOES NOT think  
they will be able to work today. —

8:38 Following People ARE PRESENT.

Lee CROSS	MLWF
Tim Kirkland	MLWF
Tim Sullivan	JE MLWF
CARL GREINER	Security FENCE
Robert O'Reilly	Security FENCE
Tom J. Tines	MLWF

Top Flight left the site shortly  
AFTER 8:00am because the didn't  
have their Medical Supervisor present.  
Top Flight worked from April 12 to  
April 16 with out proper H&S paper  
work. —

(115)

Chas. S. Galt 04/17/61

9:25 Driving over to OFF Site AREA.  
Observe. How far CRC has been.  
Tom Tines said Thursday's Meeting  
in Unionville, I will have to call  
Rob about exact time. —

9:30 Security Fence, AREA installing  
the Table Back @ Area Reinforced.  
Tim returning to office. —

~~Chas. S. Galt~~  
~~04/17/61~~

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Chad Sailer or/last

2000 arrival east @ ACS, from 16 West  
windy, Bluebird Temp ~ 69°F  
Health & Safety person on site MW with  
CONTACTS

Tom Tinius MWCF  
Doug ACS  
Museum the other KOESTER

Todd Lewis,  
Coming Over H&S, Exclusions  
AND ADVISANCE TO EXCLUSIONS ZONES.  
H&S Group will share the monitoring  
AND will communicate idea @ 8 AM  
TAL GATES will be for KOESTER @ 7 AM  
will be ATTENDING by KOESTER  
MW - people involved in Duckburg  
ACS - Doug

DANIEL Lays  
Will be POSTED IN TRAILER  
of PREVIOUS DAYS work

\* Note Museum is still the ACTING  
Health & Safety manager.

Todd asking about the Conservation  
Events - what is in Plan  
Doug will provide notes  
for direct planning early for

Chad Sailer

117

Chad Sailer or/last

Direct Communication  
Tom Froman -  
Emergency Response is a  
Setup. Procedure  
Fire Dept @ this point has not  
been Contacted Yet.

Todd Lewis

- Talk Thru Spoil / Prime
- Staging Placement
- Placement IS MW Call
- choices - Role off
- Fire Pond
- Back to be
- Over Park.

Cover All Action Today paper  
work will be provided tomorrow  
15:30 heavy line up.

People Present

PETER Vaght	MWCF
Todd Lewis	MWCF
Rob Adams	MW
James Weber	KES
Travis Kling Ford	MWA
Tom Froman	ACS
Doug Dirancy	ACS

Chad Sailer



(118)

Chad Leaf 04/25/04

Maureen Handler, KES  
 Tom Timms MWC  
 Lee Orosz

Chemist MWC

(119)

Margaret E. Mulken 04/25/01

7:00 Arrive at site. Koester safety meeting begun at 7:00 sharp. Meeting led by Maureen Handler.

8:09 Picture 10 Role 7 - facing south at North edge of the onsite area. Angstrom electric driving in grounding rod.

7:45 Top Flight arrives. They begin work immediately (ORC injection) in area just south of the south offsite area.

8:30 Koester begins test fitting respirators. The perimeter of the exclusion zone has been established.

9:09 Picture 11, Role 7. Facing south on Onsite area. Picture of Koester & MW personnel locating stub of drainage pipe.

10:00 Health & Safety Orientation. Meeting agenda notes in file.

11:15 "Dry Run" to hospital with Chad Gailley (BVSPC), Erin Blankenburger (KES) & RJ Futrrell (KES)

#### PERSONNEL PRESENT

Lee Orosz MWC Site # & S.  
 Matt Grostick MWA Drum Removal # & S.  
 Jamie Bergeron KES

Margaret E. Mulken

(20) Margaret E. Mulkerin 4/25/01

PERSONNEL PRESENT (cont.)

J Firkell KES H+S Technician  
Matt Keller KES Tech  
Heanne Camel KES  
Jim Blankenburger KES Corp. H+S  
Lauren Handler KES Construction Manager  
Lad Galey BVSPC  
Margaret Mulkerin BVSPC  
Wendy B. Frim Top Flight  
Mark Clark Top Flight  
Chris Boyles Austgen Electric  
Tela Williams MWH ORC Supervisor  
Don Church Austgen  
Brian Luebker Austgen  
Tim Kirkland Austgen  
Tim Mahghey Security Fence  
Shawn Singleton Security Fence  
Travis Klingforth MWA  
Tom Tinic MWCI Site Manager  
Zete Vagt MWA Project Manager  
Tynell Braia ACS H+S Manager  
Layne Kulm KES Operator  
3:00 LUNCH

3:30 Top Flight performing ORC  
injections in area south of the south

Margaret E. Mulkerin

(21) Margaret E. Mulkerin 4/25/01  
offsite area. Spoke with Travis Klingforth  
regarding slightly modifying array. This  
is due to the fact that a large gas pipeline  
running along the north edge of the array  
requires a 20' offsite<sup>area</sup> offset. To make  
up for this lost area, a small triangle  
along the west edge of colfax in the  
shoulder, just ~~south~~<sup>north</sup> of the pipeline  
has been proposed for additional ORC  
application.  
1500 Levee site

Margaret E. Mulkerin  
April 25, 2001

Margaret E. Mulkerin

(122) Margaret E. Mulkerin 4/26/01  
00 Arrive on site. Weather 50°F sunny,  
light wind. Toolbox Health & Safety meeting  
was conducted by Maurine Hander.

Koester Technicians, Erin Blankenberger (KES),  
Matt Grostick (MWA), Travis Klingforth  
(MWA), Pete Vagt (MWA), Larry Camp-  
bell (BVSPC) & myself were present.

Issues discussed: Equipment safety & aware-  
ness, equipment decon. procedures, Be  
aware once excavation begins, exclusion  
zone rules apply. Cannot break ground  
until electricians finish work (working  
on the grounding wires & sump pump).

300 ORC injection to continue. Stela  
Williams said they have 18 days to  
complete the work. T. Klingforth &  
P. Vagt have marked out the shoulder  
area for additional ORC injection.

000 Construction Progress Meeting.

Agenda & notes in file.

- Pete Vagt went over the tentative  
schedule. → Thurs. dig sump & dewater,  
Mon. Begin drum excavation & sampling.  
At full production, expect 90 drums/day  
6-8 weeks for completion.

Margaret E. Mulkerin

(123) Margaret E. Mulkerin 4/26/01

• Hours of work will be 700am - 530pm.

700am will be toolbox safety meeting.

800am will be supervisor safety meeting.

— which will include Koester AC&T M&V

• Rob Adams went over action items list  
resolution - see in file.

• EPA requested air monitoring results every  
two weeks.

• Any DCW sub on the site must go through  
a safety orientation meeting with Lee  
Orosz. As for daily "toolbox" safety meetings,  
that is the contractor's responsibility,  
per Montgomery Watson.

— PERSONNEL PRESENT —

Lee Orosz MWCI

Travis Klingforth MWA

Matt Grostick MWA

Jamie Bergeron KES

RJ Futsell KES

Erin Blankenberger KES

Brett Keller KES

Etienne Camal KES

Wayne Kulm KES

Pete Vagt MWA

Margaret Mulkerin BVSPC

Margaret E. Mulkerin

(124) Margaret E. Mulkerin 4/26/01

Larry Campbell BVSPC \_\_\_\_\_

Mack Clark TopFlight \_\_\_\_\_

James Friar TopFlight \_\_\_\_\_

Stela Williams MWA \_\_\_\_\_

Tim Kirkland Austgen \_\_\_\_\_

Rob Adams MWA \_\_\_\_\_

Tom Timics MWCI \_\_\_\_\_

Sean Grady IDEM \_\_\_\_\_

Kevin Adler EPA \_\_\_\_\_

10:30 Tour of site from Pete Vagt.

Walked over to the wetlands where the PCB removal is to occur. T. Timics went over the layout. Reviewed the location of the proposed sedimentation basin - they plan on expanding the drainage ditch along the west edge of the south off-site area, burming up the side.

Went onsite & looked at areas A, B, & C, and the firepond.

1300 LUNCH

1430 Austgen still working onsite on electrical. Koester prep'ing site - mobilizing equipment, set up decon area etc. No excavation to occur today.

1630 Leave site

Margaret E. Mulkerin

(125) Margaret E. Mulkerin 4/30/01

700 Arrive onsite. Weather: 70°F, sunny.

Toolbox safety meeting - reviewed

Friday's progress - all went well, 74 drums (barasses) + 11 drums went into overpacks. Will stop excavating today around 2pm in order to complete work by 5pm.

800 Meeting with Maurcen Handler, Dory Draia (ACS) + Matt Grostick. Exchange radios. Nothing else to report.

830 Matt Grostick performed air monitoring onsite this morning - had zero readings. Were able to view excavation from Friday. Took several pictures -

ROLL 7 PICTURES 12-14(?) \_\_\_\_\_

Onsite area, AREA "A" excavation.

ROLL 7 PICTURES 15-16 \_\_\_\_\_

Firepond \_\_\_\_\_

ROLL 7 PICTURE 17 \_\_\_\_\_

Koester placing drum into overpack.

900 Observe Koester. Excavating many damaged + empty drums. Overpack three drums that are intact.

Margaret E. Mulkerin

(126) Margaret E. Mulkerin 4/30/01

1100 TopFlight performing ORC injections  
Slow progress today - 5 holes complete.  
Had difficulty with last hole - dirt  
found its way inside, preventing the  
injection of the ORC. Attempted to  
clean, but had to remove the pipes,  
& re-drill hole.

1230 LUNCH

1300 PICTURE Role 8 PICTURE 1

Facing north, Standing on south  
edge of exclusion zone in area A  
(onsite) Picture of drum excavation  
(Koester)

PICTURE Role 8 Picture 2

Facing north - area A drum removal -  
placing drum in overpack

PICTURE Role 8 Picture 3

Facing north - area A drum removal -  
Koester removing drum using sling

1400 Pete Vagt informed me that he has  
been trying to reach the EPA because  
they would like to dispose of the clean  
drums in area A in the same manner  
they are disposing of the spoils drums  
(IDW) - via recycling. Right now they

Margaret E. Mulkerin

(127) Margaret E. Mulkerin 4/30/01

are separating the drum carcasses into  
two piles - clean ones, and ones which  
either contain material or have residue  
on them. The latter group will go  
for incineration, but they would like  
to recycle the "clean" ones. They  
are awaiting a decision from the  
EPA.

1430 Begin hauling excavated soil to fire pond.

1530 Leave site.



(8) Margaret E. Mulkerin 05/03/01  
 700 ARRIVE at site. Weather: 70°F Sunny.  
 Daily morning safety meeting conducted  
 by Maureen Handler of KES - reviewed  
 equipment safety, daily work schedule,  
 confined space procedures. KES has a new  
 member onsite - Maureen will go over site  
 Health & Safety with him after the meeting.  
 800 TopFlight continues ORC injection  
 in the south area. Per Stela Williams  
 of M.W., there are approx. 150 holes,  
 with 87 holes complete. May need  
 an additional 2-3 days to complete work.  
 900 Koester & M.W. ~~not~~ replace pump  
 in ENV18 in onsite area. Air monitoring  
 was performed by M.W.

PERSONNEL PRESENT

Lee Orosz MWCT  
 Jerry Clark Ryan  
 Tracy Webber KES  
 Matt Grostick MWA  
 Steven Wolcott KES  
 Bret Keller KES  
 Etienne Camel KES  
 Jamie Bergeron KES  
 RJ Futrell KES

Margaret E. Mulkerin

(129) Margaret E. Mulkerin 05/03/01  
 PERSONNEL PRESENT (cont.)  
 Maureen Handler KES  
 Travis Klingforth MWA  
 Larry Campbell BVSPC  
 Margaret Mulkerin BVSPC  
 Todd Lewis MWCI  
 Peter Vagt MWA  
 Stela Williams MWA  
 Mack Clark TopFlight  
 Brian Weaver TopFlight  
 Tom Tinics MWCI  
 David Higgins US Filter  
 Michael Matejka MTT  
 Barbara Majel K + W  
 1000 Construction progress meeting in Montgomery  
 Watson construction trailer. Meeting notes &  
 agenda in file.  
 1130 Koester performing drum excavation in  
 Area 'A'  
 1145 Spoke with Maureen Handler of KES on  
 laboratory equipment, procedures, and  
 types of samples she had tested. Maureen  
 stated that most samples were oil based  
 paint, solvents (most not chlorinated,  
 two samples were chlorinated solvents),  
 Margaret E. Mulkerin

(130) Margaret E. Mulkerri 05/03/01

\* petroleum products.

PICTURE 4 ROLE 8

Facing north - picture of drum carcasses being placed into roll off box in area 'A'  
Air monitoring being performed in background by MW

1200 LUNCH

1300 Koester putting drum carcasses in roll-offs, getting ready to begin back-filling area 'A'

1330 Spoke with Pete Vagt regarding concern that people were entering exclusion zone in the morning to prepare equipment & have no foot/shoe protection to prevent tracking contaminated soils out of the area. Also inquired about air monitoring & safety concerns at the firepond. Pete stated that ACS is responsible for air monitoring at the firepond.

PICTURE 5 ROLE 8

Facing north - picture of drums being placed on staging pad.

1400 Spoke with Matt Grostick about air monitoring procedures. Matt air

Margaret E. Mulkerri

(131) Margaret E. Mulkerri 05/03/01

monitors approx. every two hours around exclusion zone perimeter. He did monitor ~~inside the~~<sup>near</sup> around the firepond today as well, but does not do that on a regular basis.

PICTURE 6 ROLE 8

Facing north - excavation complete <sup>now</sup> thus far for area 'A'

PICTURE 7 & 8 ROLE 8

Facing south - picture of firepond

Picture 7 - outfall & free product

Picture 8 - overall view of firepond

Matt entered inside fence surrounding the exclusion zone, staying on the perimeter, to perform air monitoring, without PPE. When questioned, Matt stated the "technical" exclusion zone is only 50' outside the excavation, & he stayed further away than that.  
1530 Leave site.

Margaret E. Mulkerri  
05/03/01

Margaret E. Mulkerri